

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HIGHFIELDS CAPITAL I LP, HIGHFIELDS
CAPITAL II LP, and HIGHFIELDS CAPITAL III
LP,

Plaintiffs,

v.

BARRICK GOLD CORPORATION, AARON
REGENT, JAMIE SOKALSKY, AMMAR AL-
JOUNDI, PETER KINVER, IGOR GONZALES,
GEORGE POTTER and SYBIL VEENMAN,

Defendants.

Case No: 15 Civ. 8465 (RMB)(JCF)

ECF Case

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BG LITIGATION RECOVERY I, LLC,

Plaintiff,

v.

BARRICK GOLD CORPORATION, AARON
REGENT, JAMIE SOKALSKY, PETER KINVER,
IGOR GONZALES, GEORGE POTTER and
SYBIL VEENMAN,

Defendants.

Case No: 15 Civ. 8457 (RMB)(JCF)

ECF Case

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**DECLARATION OF MICHAEL J. HAMPSON IN SUPPORT OF
PLAINTIFFS' WALSH ACT MOTION AND MOTIONS FOR
ISSUANCE OF LETTERS ROGATORY**

Pursuant to 28 U.S.C. § 1746, **MICHAEL J. HAMPSON**, under penalty of
perjury, hereby declares as follows:

1. I am a partner at the law firm of Lowenstein Sandler LLP, counsel in these matters to Plaintiffs Highfields Capital I LP, Highfields Capital II LP, Highfields Capital III LP and BG Litigation Recovery I, LLC (collectively, "Plaintiffs").

2. I am duly admitted to practice law in the State of New York and in the courts in the Southern District of New York.

3. I submit this declaration in support of Plaintiffs' Walsh Act Motion and Motions for Issuance of Letters Rogatory.

4. Attached hereto as Exhibit A is a true and correct copy of the Complaint and Jury Demand in *BG Litigation Recovery I, LLC v. Barrick Gold Corporation, et al.*, Civil Action No. 1:15-cv-8457, filed on October 28, 2015.

5. Attached hereto as Exhibit B is a true and correct copy of the Complaint and Jury Demand in *Highfields Capital I LP v. Barrick Gold Corporation, et al.*, Civil Action No. 1:15-cv-8465, filed on October 27, 2015.

6. Attached as Exhibit C is a true and correct copy of Defendants' Amended Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) in *BG Litigation Recovery I, LLC v. Barrick Gold Corporation, et al.*, Civil Action No. 1:15-cv-8457, dated August 10, 2016.

7. Attached as Exhibit D is a true and correct copy of Defendants' Amended Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) in *Highfields Capital I LP v. Barrick Gold Corporation, et al.*, Civil Action No. 1:15-cv-8465, dated August 10, 2016.

8. Attached as Exhibit E is a true and correct copy of an e-mail from Ada Fernandez Johnson to Michael Hampson dated August 10, 2016.

9. Attached as Exhibit F is a true and correct copy of Mitchell Stice's publicly available LinkedIn profile as of August 22, 2016.

10. Attached as Exhibit G is a true and correct copy of Derek Riehm's publicly available LinkedIn profile as of August 22, 2016.

11. Attached as Exhibit H is a true and correct copy of Derek Riehm's biography on Lundin Mining Corporation's website as of August 22, 2016.

12. Attached as Exhibit I is a true and correct copy of relevant excerpts of Barrick Gold Corporation's 2010 Annual Report.

13. Attached as Exhibit J is a true and correct copy of The Globe and Mail article, "*Exclusive Interview: Peter Munk on 'hubris,' 'stupidity' and the future of Barrick Gold*" published on December 4, 2013.

14. Attached as Exhibit K is a true and correct copy of the Financial Post article, "*Peter Munk's career comes to end as Newmont firestorm envelops Barrick*" published on April 29, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2016.

By: 

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